

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Jason Wimberly  
Plaintiff

18-CV-6058-KPF

V.

Experian Information Solutions, Inc.  
Defendant

**MEMO ENDORSED**

**MOTION FOR EXPEDITED DISCOVERY AND EXTENSION OF TIME TO FILE PROPOSED  
AMENDED COMPLAINT**

Comes now, Plaintiff Jason Wimberly and moves this court both upon the papers annexed hereto and in accordance with FRCP Rule 26(D) and Rule 31 (a)(2)(A)(iii) for an ORDER granting permission to subpoena non-party Maximus Federal Services Inc. for any and all responsive documents in its possession, control, or custody that detail the reporting history of each and every one of the Plaintiff's student loans, AND for an ORDER permitting the Plaintiff, to serve written depositions upon Maximus Federal Services, Inc. comprised solely of questions related to the history, reporting, and investigations of disputes of the loans with no more than 25 questions.

AND for a limited ORDER directing TransUnion and Equifax, Inc. to produce documents and credit reports relating to the loans at issue.

AND for an ORDER directing the United State Department of Education to produce and certify the accuracy of the documents related to the payment history and chain of custody of the loans, that is, which loans were guaranteed by loan servicers, the identity of the servicer or guarantors of the loans, and documents that map the loans to the servicer of the loans, the balances at the time the loans were transferred to the servicer or the guarantor as well as produce evidence of collection activities on Plaintiff's student loans and reporting of the Plaintiff's student loans to Equifax, Defendant Experian, and TransUnion.

AND for an ORDER granting extension of time for Plaintiff to file his proposed amended complaint.

Respectfully submitted,

/s/Jason Wimberly.

Pro Se

The Court is in receipt of numerous submissions from Plaintiff, including a motion to seal documents (Dkt. #66); a memorandum supporting that motion (Dkt. #67); a combined motion for leave to conduct expedited discovery and for an extension of time to file a second amended complaint (Dkt. #68); and a letter requesting expanded ECF privileges (Dkt. #69).

In regards to Plaintiff's request for expanded ECF privileges, Plaintiff's request is DENIED. If Plaintiff wishes to file sealed documents with the Court, he is invited to file his motion to seal electronically and then mail a hard copy of the documents he wishes to be sealed, in compliance with the Court's Individual Rules.

Given the procedural history of this case and the Court's disinclination to authorize Plaintiff to embark on a fishing expedition, Plaintiff's request for expedited discovery is likewise DENIED. In order to gain expedited discovery, Plaintiff must make a showing that meets "a flexible standard of reasonableness and good cause." *Digital Sin, Inc. v. Does 1-176*, 279 F.R.D. 239, 241 (S.D.N.Y. 2012). Plaintiff has shown neither reasonableness nor good cause, given that he has simply requested information that in many ways he seems to already possess.

Plaintiff's request for an extension to file a motion for leave to amend is GRANTED. Plaintiff is ORDERED to file his motion on or before February 25, 2020.

Finally, Plaintiff's motion to seal documents is DENIED without prejudice as to renewal. If and when Plaintiff files a motion to amend his complaint, and if Plaintiff believes that documents necessary to that motion require sealing, Plaintiff may file a renewed motion explaining in detail what information needs to be redacted and why.

Dated: February 4, 2020  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE